

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA : CRIMINAL NO. 6:22-mj-00013
:
VERSUS :
:
FURMON BOZEMAN : MAGISTRATE JUDGE WHITEHURST

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Charles D. Shorter, being first duly sworn, hereby depose and state as follows:

Your affiant is employed as a Louisiana State Police Trooper and is currently assigned to the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), Lafayette Satellite Office, New Orleans Field Division as a Task Force Officer. I have been employed with the Louisiana State Police since 2016. I am currently assigned to the ATF as a Task Force Officer. I have been a Task Force Officer with the ATF since 2019. I became a criminal investigator with the Louisiana State Police in 2019. I have attended training in the field of investigative methods and techniques to further my knowledge in the field of criminal investigations. In addition to my investigative training and experience, I have worked as a patrol officer, a street level narcotics officer, an interstate interdiction Trooper, and a SWAT Team Operator. Through my training and experience, I am knowledgeable about federal firearms, explosives, and drug laws. During my time in law enforcement, I have participated in numerous investigations of individuals involved in the illegal use, possession,

transportation and manufacturing of firearms, illegal controlled substances, and explosives. In such investigations, I have conducted physical surveillance, and electronic surveillance. I have authored, executed, and participated in firearms, explosives, and narcotics search warrants. I have also received training in the collection and recovery of digital media.

1. I make this affidavit in support of an application for an arrest warrant for **Furmon BOZEMAN** for possession of a destructive device, in violation of Title 26, United States Code, Section 5861(d).

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses involved with this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. On January 11, 2022, Iberia Parish Sheriff's Office deputies arrived at Nabors Offshore Corporation (hereinafter, "Nabors") in reference to a vandalism complaint. Upon arrival, deputies located what appeared to be a suspected pipe bomb that had been detonated. Nabors is located at 4400 West Admiral Doyle Drive, New Iberia, Louisiana—within the Western District of Louisiana.

4. At approximately 1027 hours, your affiant arrived on scene and observed what appeared to be three separate blast sites within the Nabors' property lines. Also present with your affiant were agents and officers with ATF, Louisiana State Police (LSP), Homeland Security Investigations (HSI), Federal Bureau of Investigations (FBI), University of Louisiana at Lafayette Police Department

(ULLPD), and Chitimacha Tribal Police K9 (CTP). Interviews were conducted with multiple employees associated with the business to include Human Resources Generalist, Stacy Hicks.

5. During an interview with Hicks, she provided information indicating that an employee had recently been terminated due to a canceled third-party contract. According to Hicks, this employee was hired as an electrician. Soon thereafter, the news of his termination resulted in the employee becoming hostile towards human resources personnel and calling them "heartless bitches."

6. While investigators were conducting interviews, a Chitimacha Tribal Police Officer deployed a bomb detection K9 to search the premises. During that search, the K9 alerted to three blast sites. These sites were located at: (1) the Nabors signage located near the roadway (Admiral Doyle); (2) the main entrance to the human resources office; and (3) the Nabors signage located directly outside the front of the building. Pursuant to an open-air sniff, the K9 also alerted to the area that the perpetrator's truck was parked on site shortly before and after the explosions.

7. ATF bomb technicians field tested potential explosive residue, which appeared to be unconsumed smokeless powder, which was located at the human resources entrance blast site. According to the ATF bomb technician, the preliminary field test conducted on the residue tested positive for nitrocellulose and nitroglycerin. These substances are the components to double based smokeless powder. Investigators found a burn trail at the blast site of the human resources entrance, which according to an ATF bomb technician, is evidence of a fusing system. Additionally, during the processing of the three blast sites on the property,

investigators found fragments of galvanized steel pipes and endcaps. ATF Explosives Enforcement Officer (EEO) Alex Guerrero examined these components and stated these devices meet the definition of a destructive device, commonly known as a pipe bomb.

8. Title 26, United States Code, Section 5845(a) defines a “firearm”, in part, as a destructive device. Title 26, United States Code, Section 5845(f) further defines a “destructive device” as any explosive, incendiary, or poison gas, bomb, grenade, rocket having a propellant charge of more than four ounces, missile having an explosive or incendiary charge of more than one-quarter ounce, mine, or similar device.

9. Agents and officers involved with the investigation then conducted surveillance for available video footage from surrounding businesses. Video obtained from the ULL research center shows a dark colored full size pickup truck parked in the grass of the research center’s property minutes before the explosions. The vehicle leaves the research center property at or around the time of one of the explosions (approximately 0448 hours) in a northern direction. The ULL research center is located directly across the street from Nabors.

10. Video obtained from the Nabors’ property shows smoke emitting near the human resources entrance door at approximately 0446 hours. Within approximately four seconds, a detonation occurred shattering the human resources glass door.

11. A search of the local license plate reader (LPR) system was conducted for the dark colored full size pickup truck, which identified a black Chevrolet

Silverado bearing Alabama license plate 5AW8374. This vehicle type fits the description of the dark colored full size pickup truck observed on the ULL camera. The results indicated this vehicle traveled westbound on US Highway 90 near LA Highway 182 at approximately 0354 hours in Calumet, Louisiana, and again was observed on LA Highway 182 at approximately 0455 traveling westbound, towards Broussard, Louisiana. At approximately 0459 hours, the vehicle is detected in Broussard, Louisiana, on US Highway 90 traveling westbound. It should be noted that the distance from Calumet, Louisiana, to Nabors is approximately forty-two minutes, and the distance between Nabors and US Highway 90 in Broussard, Louisiana, is approximately thirteen minutes.

12. A search of additional LPR systems discovered the vehicle (5AW8374/AL) took a southwest approach from the I-10/I-12 corridor, and then a northeast approach back to the I-10/I-12 corridor towards Mississippi after the pipe bombs had been detonated.

13. An inquiry into the vehicle's registered owner returned an individual identified as Furmon Earl Bozeman (W/M; DOB: 01/07/1961) of Gulf Shores, Alabama.

14. A subsequent interview with Stacy Hicks identified Bozeman as the aforementioned electrician that got fired as a result of the third-party contract cancellation. Hicks also identified Bozeman as the individual who had referred to the human resources staff as "heartless bitches."

15. An open-source search of Bozeman reveals he has a Louisiana based social security number, but no known Louisiana based residences.

16. At approximately 1900 hours on January 11, 2022, an officer with the Gulf Shores Police Department positively identified the aforementioned Chevrolet Silverado as being parked in the driveway of Bozeman's listed physical address—619 Glen Eagles Avenue, Gulf Shores, Alabama 36542. This address also corresponds to the address of record with Nabors' employment files.

17. On January 12, 2022, your affiant obtained a search warrant for 619 Glen Eagles Avenue, Gulf Shores, Alabama, through the Southern District of Alabama. During the execution of the warrant, agents and officers seized the following items from the residence: a Dewalt bag containing thirty seven (37) suspected m-type explosive devices as well as a lighter and length of green fuse; a Henderson Travel Plaza receipt (dated 01/11/2022); a Buc-ee's receipt (dated 01/11/2022); four samples of energetic powder collected from a work bench area in the garage; a flash powder cookbook (with receipt); Hodgdon smokeless powder; aluminum powder; magnesium; flash powder; suspected marijuana (unknown weight); Alabama hoodie; Garmin GPS; several rounds of various types of ammunition; and several firearms.

18. Per Special Agent Bomb Technicians (SABT), the Hodgdon powder is a double base smokeless powder that contains nitrocellulose and nitroglycerin. This double base smokeless powder is consistent in shape and size of the unconsumed powder that was recovered at the human resources door blast site at Nabors Offshore Corporation. The loose powder collected from the workbench in the garage of BOZEMAN's residence was also consistent in shape and size of the unconsumed powder that was recovered at the human resources door blast site. SABTs conducted

a flame susceptibility test of the loose powder that was located on the workbench, and it was proven to be energetic materials consistent with smokeless powder. The burn trail located at the human resources door blast site was similar to a common hobby fuse or a safety fuse which is similar to the length of fuse located in the Dewalt bag.

19. Law enforcement officials went to both the Henderson Travel Plaza and Buc-ee's locations found on the receipts recovered from BOZEMAN's residence. Law enforcement reviewed video footage which corresponds with the date and times on the receipts located during the search warrant. In reviewing the Henderson Travel Center surveillance footage, law enforcement officials observed BOZEMAN enter the location wearing what appears to be the Alabama hoodie collected from the residence. In reviewing the Buc-ee's surveillance footage, law enforcement officials observed BOZEMAN enter a black Chevrolet pickup alone. This pickup matches the description of the pickup detected by the LPRs, on January 11, 2021.

20. An ATF agent conducted a preliminary interview with BOZEMAN's wife, Starcia Bozeman. The interview was conducted by phone. Starcia provided that she and BOZEMAN watched the college football championship game during the night of January 10, 2022 at their residence. At the conclusion of the game, BOZEMAN told her that he was going out. BOZEMAN did not return to the residence, at which point Starcia attempted to access his cellular device location and discovered he left his phone at their residence. BOZEMAN did not return to the residence until approximately 1100 hours on the morning of January 11, 2022. Starcia's statements about BOZEMAN's travels are consistent with the LPR detection times associated with his pickup.

CONCLUSION

Based on my training and experience and the facts as set forth in this affidavit, I respectfully assert probable cause exists to believe that Furmon BOZEMAN has committed violations of Title 26 U.S.C. § 5861 (d), possession of a destructive device. It is requested that a Federal Arrest Warrant be issued for Furmon BOZEMAN.



CHARLES D. SHORTER
ATF Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Subscribed and sworn before me this 14 day of January 2022
at Lafayette, Louisiana.



HONORABLE CAROL B. WHITEHURST
United States Magistrate Judge
Western District of Louisiana